



Perry Johnson Registrars Food Safety, Inc.

PrimusGFS Certification Procedure

PJRFSI offers certification services to companies seeking independent validation of their PrimusGFS a detailed and rigorous process. This procedure details from start to finish the life cycle of the PrimusGFS certification process.

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1 References

- 1.1. ISO/IEC 17065: Conformity Assessment – Requirements for Bodies Certifying Products, Processes and Services (latest revision)
- 1.2. PrimusGFS General Regulations (latest version)
- 1.3. PrimusGFS Glossary (latest version)
- 1.4. PrimusGFS Interpretation Guidelines (latest version)
- 1.5. PrimusGFS Questions & Expectations (latest version)
- 1.6. Exhibit C – Use of PrimusGFS Logo
- 1.7. #FS-1primus – PrimusGFS Food Safety Certification Questionnaire/Client Application
- 1.8. #F-207 – Food Safety Quote Approval and Audit Justification Checklist
- 1.9. #F-3primus – Certification Agreement
- 1.10. #F-3tc – Terms and Conditions
- 1.11. #F-71primus – PrimusGFS Certification Personnel Statement of Availability Form
- 1.12. #F-163primus – PrimusGFS Audit Scheduling Acknowledgement Form
- 1.13. #F-27fsi – Auditor Assignment Form
- 1.14. #WBfsprimus – PrimusGFS Auditor Workbook
- 1.15. #F-184fs65-A – Audit Plan Template
- 1.16. #F-67fs65 - Audit Package Review Form – Food Safety Programs
- 1.17. #F-67fs65-A, Audit Report Review Form - Food Safety Programs
- 1.18. #F-144fsi Transfer of Certification Body Checklist
- 1.19. #SOP-10 Dispute/Appeal Procedure
- 1.20. Azzule Systems (PrimusGFS database and web application)
- 1.21. PJView – Perry Johnson Registrars Food Safety Inc.'s client database and project management system

2 Definitions

- 2.1 PrimusGFS – GAP, GMP & HACCP based food safety certification program published and licensed by the Azzule Systems.
- 2.2 Operation - The organization seeking PrimusGFS certification. Until a contract for certification services is signed with PJRFSI, the Operation is initially referred to as an Applicant.
- 2.3 Scope of Certification – a description of the certification sought by the Operation which will be covered in the audit program and detailed in the certification certificate. The scope includes: the name and address of the site-specific facility(s) covered; the applicable PrimusGFS Module; the product types. The scope of certification also specifies exclusions, if any, which must be agreed and approved by PJRFSI in advance of the certification audit.
- 2.4 Site - A single physical address or facility that will be audited and granted a certificate, either individually or as part of a multiple site scheme as allowed by PrimusGFS.
- 2.5 Certificate of Registration - A certificate and associated documents affirming that the PrimusGFS management system operated by the Operation has, as a result of the documented assessment procedure conducted by PJRFSI, been found to be in accordance with the applicable PrimusGFS Global Standard and the scope of certification sought by the Operation.
- 2.6 Auditor – an employee or contractor of PJRFSI who has been qualified by PJRFSI and registered in the PrimusGFS Database as a PrimusGFS Auditor and is therefore qualified to conduct PrimusGFS certification audits.
- 2.7 Pre-assessment - An informal and optional onsite evaluation carried out by a PJRFSI auditor to assess the Operation's overall PrimusGFS food safety to determine the Operation's readiness for a PrimusGFS certification audit.

- 2.8 Certification Audit – an onsite audit of the Operation’s overall PrimusGFS food safety and quality management system and facility conducted by a PJRFSI auditor.
- 2.9 Recertification Audit –twelve (12) month post-certification audit (based on the compliance grade achieved at the previous audit) conducted by a PJRFSI auditor to assess the continued effectiveness of the Operation’s PrimusGFS system in its entirety and to serve as the basis for re-qualifying the Operation for continued certification.
- 2.10 Technical Reviewer – individuals who are competent to review audit results and render certification recommendations.
- 2.11 Designee – a PJRFSI employee who is designated and trained to complete specific procedural functions on behalf of another PJRFSI position. Throughout this SOP-1primus procedure, functions which may be completed by a designee will include the following references: “[position] or designee...” or “[position]/designee...”
- 2.12 PrimusGFS Logo - The PrimusGFS Logo, as issued and authorized by PrimusGFS for use by a certified Operation, to publicize that the Operation has proven its compliance with the PrimusGFS Standard and scope of certification.
- 2.13 PrimusGFS Database (Azzule Database) – an online directory of certificated PrimusGFS

3 Request for Certification

- 3.1 The Applicant initiates the application for certification process via a written or verbal request.
- 3.2 In response, a PJRFSI Project/Sales Manager or the Food Safety Sales Coordinator or designee provides the Applicant with the #FS-1 – Food Safety Certification Questionnaire/Client Application.
- 3.3 For AuditOne requests for certification a General Quote Request Form will come from the application through AuditOne Database. The Food Safety Sales Coordinator or designee will download the General Quote Request Form.
- 3.4 Duly Authorized representatives of the Applicant must complete and sign the Questionnaire/Application to provide PJRFSI with sufficient information required for providing a quote.
- 3.5 Upon receipt of the signed application, PJRFSIs Food Safety Sales Coordinator or designee trained in PrimusGFS quoting procedures conducts an application review to ensure that:
 - a. certification requirements are clearly defined, documented, and understood;
 - b. any differences in understanding between PJRFSI and the Applicant are resolved; and
 - c. PJRFSI has the technical resource and competencies to perform the certification services sought by the applicant, and if not, PJRFSIs Food Safety Sales Coordinator or designee in consultation with the Food Safety Program Accreditation Manager will reject the application.

The record of this review is the Food Safety Sales Coordinator or designee’s signature at the bottom of the #FS-1 Food Safety Certification Questionnaire/Client Application and a completed #F-207 – Food Safety Quote Approval and Audit Duration Justification Checklist.

For PrimusGFS/AuditOne application review the record of this review is the Food Safety Sales Coordinator or designee’s signature at the bottom of the completed #F-207 Food Safety Quote Approval and Audit Duration Justification Checklist.

- 3.5 Based on the information furnished by the Applicant and the input from the application review process, the Food Safety Sales Coordinator or designee completes an #F-207 which is a record of: the determination of scope including exclusions; the justification for quoted audit days; and the overall quote approval.

- 3.5.1 The scope of certification is determined using the latest PrimusGFS guidance regarding, as applicable, audit scope, exclusions, extensions, and auditing of multiple sites.
- 3.5.2 The required number of audit days is determined using the latest PrimusGFS audit duration guidance with consideration of the following possible deviations:
 - 3.5.2.1 Possible reasons for increasing audit duration include the following:
 - a. Type of operation(s)
 - b. Number of operation(s)
 - c. Size of the operation(s)
 - d. Number of workers
 - e. Number of products and similarity of production process(es)
 - f. Complexity of the production and/or handling process(es)
- 3.5.3 Deviations from the audit duration guidance are justified on the #F-207. Any deviations from the minimum expected audit duration shall be properly justified and shall be included in the Audit Executive Summary/scope. Reasons for a deviation may include scope, operation size, operational process reduction on-site, a halt in the audit process by the organization, re-evaluation of the operation, etc. [Due to factors which might only be revealed once the Auditor is onsite, the Auditor may request a deviation in the actual audit time from the quoted audit time. In this case, the Auditor always contacts PJRFSI's Food Safety Program Accreditation Manager or designee for pre-approval and the Auditor justifies the deviation on the PrimusGFS audit report.]
- 3.5.4 PJRFSI may conduct PrimusGFS audits combined with other certification system audits or audit elements, as long as all program rules are met and the integrity of any one component of the combined audit is not compromised. PJRFSI does not, however, conduct any consulting or training in combination with PrimusGFS audit activity. Details of combined audits are specified on the audit report.
- 3.6 A pre-assessment is optional but encouraged, particularly those seeking initial certification to the applicable standard. A scheduled pre-assessment audit cannot be converted into a certification audit once the audit has begun or post audit.
- 3.7 Transfers are handled in accordance with @Section 12 below.
- 3.8 Based on the information from the application review (#FS-1primus) and quote approval process (#F-207), the Food Safety Sales Coordinator or designee completes a quotation in the form of a Certification Agreement (#FS-3primus) to cover the costs of the proposed audit activity [pre-assessment, certification audit, and/or recertification audit(s) as applicable] and any associated fees.
- 3.9 A PJRFSI Project/Sales Manager or designee provides the Applicant with a duly authorized copy of the Certification Agreement (#FS-3primus) and the Terms and Conditions (#FS-3tc). (In some cases, the Certification Agreement and Terms and Conditions are forwarded directly to the Applicant by PJRFSI Sales Coordinator or the Food Safety Program Coordinator/designee.) The Applicant then signs and returns a copy of the Certification Agreement bearing an original signature.
- 3.10 Signatures by both parties indicate mutual agreement of Certification Agreement including the scope of certification and any exclusions, the certification costs, and the associated Terms and Conditions. After the Certification Agreement is signed, amendments, agreed upon by both parties, may be made as necessary. However, once the certification audit has begun, the scope of the certification shall not be altered.
- 3.11 Receipt of the signed Certification Agreement and the first installment payment from the Operation is taken by PJRFSI as an instruction to proceed in accordance with the PrimusGFS Certification Agreement and the Terms and Conditions. The Food Safety Program Coordinator or designee sends the Applicant, hereafter referred to as the Operation:

- a. a summarized version of the Certification Procedure (#SOP-01primus);
 - b. other guidance documents describing the audit process, as appropriate; and
 - c. PrimusGFS database user guides
- 3.12 The Food Safety Program Coordinator or designee is responsible for monitoring and verifying the progress of the Operation's certification program including but not limited to audit/certification status, and timeline/due date performance for both Operation and Certification Body (PJRFSI) activities.
- 3.13 If the requirements for certification change at any time and need retroactive implementation, PJRFSI's Food Safety Program Accreditation Manager or designee will ensure that the Operation is notified as soon as possible by the most appropriate means and that the new requirements are followed/implemented at the next onsite audit activity or sooner if necessary.

4 Scheduling Audits

- 4.1 Once the signed Certification Agreement (#FS-3primus) is received, the Food Safety Program Assistant or designee assigns a PrimusGFS registered auditor to the audit after verifying that:
 - a. The Auditor is registered in the PrimusGFS Database as qualified to audit all food sector categories in the Operation's scope of certification;
 - b. The Auditor has had no prior relationship with the Operation which would present a conflict of interest. The Auditor will confirm this by signing a Certification Personnel Statement of Availability (#F-71primus) before completing the audit.
 - c. The Auditor has not undertaken audits at the same site on more three (3) consecutive audits
- 4.2 The Operation is assigned to Food Safety Program Assistant (Scheduler) who will contact the Operation's Management Representative to schedule dates for the auditing activities. The Scheduler then coordinates the desired dates with the availability of the assigned Auditor pre-selected by the Food Safety Program Accreditation Manager or designee. Often, this process takes several contacts between the Operation and the Auditor before dates for the auditing activities are mutually agreed upon.
- 4.3 The Scheduler sends the Scheduled Audit Form to the auditor when the dates are confirmed and entered into PJview.
- 4.4 The Scheduler then sends the Operation an Audit Scheduling Acknowledgement form (#F-163fsi) or equivalent document for the Operation to sign and return by fax which indicates:
 - a. Operation's acceptance of the proposed audit dates and time;
 - b. Operation's acceptance of the proposed audit team whose background information is available upon request. The Operation has the right to object in writing to the appointment of any particular auditor or technical expert providing the objection is valid, i.e. employee of a competitor, personal differences, etc.
 - c. Operation's confirmation that all processes/procedures/activities will be ready by the proposed audit date.
- 4.5 The Scheduler then creates an Auditor Assignment Form (#F-27fsi) and forwards it to the Auditor(s) after approval by relevant Customer Service Personnel.
- 4.6 Prior to the start of the onsite audit the Operation must have completed an Internal Audit and Management Review Meeting as according to PrimusGFS Standard.

5 The Certification Audit (Initial Certification and Recertification Audits)

- 5.1 PrimusGFS Auditors utilize the latest version of the relevant PrimusGFS to conduct audits but will

not add additional standards or criteria. PJRFSI may seek additional guidance/interpretation from the PrimusGFS and/or Accreditation Bodies as needed.

- 5.2 PJRFSI undertakes the Certification Audit to verify the effectiveness of the Operation's PrimusGFS System in its entirety to establish and ensure:
 - a. the effective interaction between all elements of the PrimusGFS System; and
 - b. that the Operation has demonstrated a commitment to maintaining the effectiveness of the PrimusGFS System and to meeting regulatory and customer requirements.
- 5.3 The Auditor is responsible for completing the Audit Workbook (#WBfsprimus) and creating an Audit Plan using the #F-184fs65-A Audit Plan Templates, which will be forwarded to the Operation at least one week in advance of the audit.
- 5.4 The Operation's senior management personnel, who have the appropriate authority to ensure that corrective actions will be implemented in response to any non-conformities found, are expected to attend the opening and closing meetings for all audit activity. In particular, the most senior operations manager onsite or their nominated deputy shall be available at the audit and attend the opening and closing meetings. All of the Operation's personnel are expected to fully assist the Auditor at all times.
- 5.5 To verify conformance, the PrimusGFS Checklist and the PrimusGFS Questions and Expectations shall be used. There are information gathering questions included throughout the audit that are worth zero points each. For scored questions, each question of the PrimusGFS Checklist has a possible score assigned to it. The auditor must evaluate and answer each one of the questions that applies to the operation being audited.
- 5.6 Organization has the option to choose an off-site desk audit review prior to the onsite audit. Organization fills out and sends back FS-108ict. PJRFSI reviews and if approved then a desk audit is scheduled. The same auditor will perform both the desk review and onsite audit.
- 5.7 For multiple day audits, the Auditor must hold a daily wrap-up meeting with the PJRFSI audit team and the Operation's key personnel to discuss a summary of the findings of that day.
- 5.8. On the last day of the audit, the Auditor will hold a closing meeting using the Closing Meeting Agenda. During this meeting, the Auditor reviews the audit findings, including the non-conformities, with the Operation's senior management personnel. When discussing the findings, the Auditor should never comment on the likely outcome of the certification process.
- 5.9. At the close of the audit or within one working day of the last day of the audit, the Auditor provides the Operation with a written summary of the non-conformities discussed at the closing meeting.

6 Nonconformities and Corrective Actions

- 6.1 PrimusGFS defines the following answers to the questions in each module:
 - a. Non-conformance - To have not met the question and/or conformance criteria requirements at all. Having systematic deficiencies against the question and/or conformance criteria (severe or non-severe issues).
 - b. Major nonconformity - To have major deficiencies against the question and/or conformance criteria. To have numerous non-severe deficiencies (usually more than three) against the question and/or conformance criteria. To have single or isolated severe deficiencies against the question and/or conformance criteria. To have covered some of the question conformance criteria, but not most of it.
 - c. Minor deficiency - To have minor deficiencies against the question and/or conformance criteria. To have single or isolated non-severe deficiencies (usually up to three) against the question and/or conformance criteria. To have covered most of the question conformance criteria, but not all.

- d. Total conformance - To meet the question and/or conformance criteria in full.
 - e. Non-applicable - The requirement described in the question is not applicable for the operation being audited. Justification should be provided in the auditor's comments. Be aware that there are some questions that do not allow answering Non-applicable.
- 6.2 Once the Auditor has made an observation during the audit, the Operation, if possible, may take corrective action during the audit. However, the Auditor's rating must reflect the condition or status prior to the Operation's corrective actions.
- 6.3 Regardless of the severity of findings, the Auditor is expected to complete the audit except when extreme circumstances would not allow him/her to do so.
- 6.4 The number and type of nonconformities found during an audit determine, according to PrimusGFS guidelines: the grade achieved, whether certification will be granted, and the resulting audit frequency. The findings, as well as the full audit report, are always subjected to a full technical review by PJRFSIs Technical Reviewer. If the technical review process results in any change in the findings, the Operation will be notified.
- 6.5 For all audits, the Overall Total Score calculated in the preliminary stage will need to be $\geq 85\%$ in order to proceed to the subsequent certification decision phase. If the preliminary overall total score is $<85\%$ then the audit is "not certified." The applicant organization will still have the availability to submit correctives actions, but they will not be calculated to achieve certification. If the preliminary score is $\geq 85\%$ but $<90\%$, corrective actions will be required in order to become certified.
- 6.6 There are certain questions in the PrimusGFS checklist that if down scored will result in an automatic failure and an overall score of 0% for the corresponding module. These questions are identified with a phrase similar to: "ANY DOWN SCORE IN THIS QUESTION RESULTS IN AN AUTOMATIC FAILURE". Applicant should be immediately informed of the automatic failure by the auditor during the audit.
- 6.7 The PJRFSI reserves the right to fail the audit due to special circumstances. Some examples include deliberate illegal activities, physical acts/threats to an auditor, attempted bribery, falsified records, etc., or finding serious food safety issues during the audit.
- 6.8 The auditor will contact PJRFSIs Food Safety Program Accreditation Manager or designee to discuss the findings and verify their severity. If findings are confirmed which would result in non-certification, PJRFSIs Food Safety Program Accreditation Manager or designee immediately suspends certification for a certified Operation.
- 6.9 In the event of a failure to achieve or maintain certification, Operations, where required by their customers, must notify their customers of the circumstances and the Operation's intended corrective actions.
- 6.10 For all non-conformances (scored as zero points) raised during the audit, the applicant organization must submit corrective actions into the PrimusGFS database for review by PJRFSI. If no corrective action is possible, the organization should detail what they will do to control the risk.
- 6.11 For all non-conformities, the Operation should submit satisfactory objective evidence to the Auditor within 25 calendar days of the last day of the audit to allow the Auditor time to close the nonconformities by 30 calendar days of the last day of the audit. If time allows (within the 30-calendar day corrective action timeframe), when corrective action evidence is rejected by PJRFSI, the organization can re-submit additional evidence to close the non-conformance.
- 6.12 PJRFSI has the right to determine whether documentary evidence or an onsite revisit is required to verify the corrective actions for any non-conformance found.
- 6.13 If satisfactory evidence to close out nonconformities is not provided within the 30 calendars days of the first day of the audit, PJRFSI will not grant certification or will withdraw certification as

appropriate and the Operation will require an additional full audit to be considered for certification.

- 6.14 PJRFSI must notify the PrimusGFS of any changes in an Operation's certified status and amends the Operation's record on the PrimusGFS Database accordingly.

7 Audit Reporting and the Certification Decision

- 7.1 The Auditor documents the results of the audit using the latest version of the PrimusGFS Audit Report and following the latest PrimusGFS guidelines for audit reporting in the PrimusGFS Database.
- 7.3 Within fifteen (15) calendar days from the last day of the audit, the Auditor uploads the preliminary audit report to the PrimusGFS Database and submits the audit working documents to PJRFSI Audit Support Assistant or designee to forward to a Technical Reviewer for a preliminary technical and grammatical review.
- 7.4 PJRFSI's Technical Reviewers are required to sign the #F-71primus – Certification Personnel Statement of Availability prior to beginning a review of an audit report or package in order to confirm that they are impartial and free from any conflict of interest. Note: The Auditor who carried out the evaluation may not serve as the Technical Reviewer.
- 7.5 The PJRFSI Technical Reviewer conducts a preliminary technical and grammatical review of the audit package and documents the review on the Audit Report Review Form (#F-67fs65-A), or an equivalent format. If needed the report is returned to the Auditor for clarification or revision. A record of reviews is maintained using the Audit Package Review Form (#F-67fs65).
- 7.6 By 30 calendar days from the last day of the audit, the Auditor finalizes the audit report and accepts the Operation's corrective actions in the PrimusGFS Database. The Technical Reviewer completes the final technical review and documents it and certification recommendation on the Audit Report Review Form (#F-67fs65-A) and in the PrimusGFS Database.
- 7.7 In cases where the Technical Reviewer rejects the package, s/he or the Food Safety Program Coordinator or designee is responsible for contacting the Auditor or Operation for resolution. As appropriate, the Technical Reviewer or other competent designee is responsible for providing any clarification or any additional training to the Auditor.
- 7.8 Certification of PrimusGFS Systems is awarded to Operations who achieve an overall total score of 90%. Each one of the Module Scores for the operation must be a minimum of 85% to be certified. All Overall Scores for all audits must be $\geq 85\%$ in the preliminary stage in order to be certified. If the preliminary score is less than 85%, a not certified decision is made. Another audit will be necessary to receive certification. Certification decision will be taken by PJRFSI's PrimusGFS technical reviewer.
- 7.9 PJRFSI has 45 days after the audit to review the corrective action evidence and make the certificate decision. If Certification is granted, PJRFSI's Food Safety Program Coordinator or designee notifies PJRFSI's Food Safety Program Assistant. The certificate must be issued from the PrimusGFS system. The Certificate Department obtains approval of the certificate from the Operation.
- 7.10 PJRFSI's Food Safety Program Assistant or designee issues the certificate. Delivery of the Certificate and other documents may be delayed until all outstanding invoices have been paid by the Operation.
- 7.11 Certification of an Operation's PrimusGFS System by PJRFSI shall provide confidence that the System meets the specified requirements and that the Operation has implemented and is maintaining and operating the PrimusGFS System effectively and in accordance with the scope specified on the Certificate of Registration.

8 Ongoing Audit Frequency and Maintenance of Certification

- 8.1 In order to maintain Certification, an Operation is required to attain the minimum compliance audit rating or greater and ensure all nonconformities are corrected within specified timeframes.
- 8.2 The subsequent audit should be scheduled 12 months from the date of the previous audit and not from the previous certificate issue date. This frequency may be modified due to factors, such as:
- Modification of the scope and/or operation's location during the certificate validity.
 - Seasonality of the products.
 - An extension lasting an additional 3 months from the current certificate expiration date may be granted by PJRFSI that made the certification decision. There must be justifiable circumstances that are documented.
 - Quantity and type of non-conformances detected at the time of the audit (e.g., a re-audit or a re-visit may be required to receive certification).
 - Additional visits may be required due to insufficient corrective action evidence.
- 8.3 The certified organization shall inform PJRFSI of any significant changes, which could affect the safety of product. This includes any ownership and/or management changes, and any changes made to the process, machines or production practices.

9 Unannounced Audits

- 9.1 PJRFSI unannounced certification audits must be conducted on certified organizations participating in a GFSI recognized program following this cycle and will be managed by the CBs:
- a. Farm, Harvest Crew, Indoor Agriculture, Cooling and Cold Storage, and Packinghouse (GFSI Scope BI, BII, BIII) Certification bodies perform 10% unannounced per year
 - b. Processing and Storage and Distribution (GFSI scopes CII, CIII, CIV, G) One (1) unannounced audit is required every three (3) years for each certified organization
- 9.2 The following rules apply to unannounced: The unannounced audit(s) should be performed using the current PrimusGFS checklist. The unannounced audit(s) should be scheduled based upon the seasonality of the applicant's production following iv and v above. The applicant will have a choice to select "blackout" date periods within the application. The audit reports and certificates will display information the audit was conducted as unannounced.

10 Surveillance Audits

- 10.1 PJRFSI has a surveillance program in place for their certified organizations. The audits will be performed using the current PrimusGFS checklist the version the chosen organization(s) is certified against. The selected organization with certified operation(s) must reach the required scoring as a certification audit in order to maintain their certification.
- 10.2 The surveillance program is based on a risk assessment approach, considering factors such as compliance history, appeals and complaints, product type(s), complexity of the process(es), or any other factors PJRFSI determines.
- 10.3 PJRFSI will notify the organization's chosen operation(s) (using the PrimusGFS software) of the unannounced audit no sooner than 48 hours prior to the day of the audit. The organization can only reject a surveillance audit one time with justifiable reasons. If rejected on the second attempt, this will result in a suspension of all current audit certificates. Surveillance audits are not an approved substitute for the unannounced audits.

11 Remote Audit Activities

- 11.1 Remote activities include the use of remote documentation desk review. This approach will allow an

auditor to review all applicable documents related to the organization's PrimusGFS program prior to arriving on-site.

11.2 Desk review can only be requested for announced or preassessment audits

- a. Organization must select the PrimusGFS desk review option when completing the application

11.3 After the application has been reviewed and approved by PJRFSI the organization must complete a self-assessment and submit required documentation. The documents can be submitted through the following options:

- The PrimusGFS 1st party audit tool in the PrimusGFS Auditee System
- The Azzule Supply Chain Program Compliance Grid
- PJRFSI file sharing documentation (sharepoint or dropbox etc)

11.4 The same auditor must conduct the desk review and the on-site audit.

11.5 There shall be no more than thirty (30) days between the use of desk review and the completion of the on-site audit.

- a. Under specific circumstances where the 30-day requirement cannot be met, the CB should have a process in place to analyze and identify any risks associated with the organization (e.g., risk assessment as per Section 2, c. i.) prior to granting the extended period between the desk review and on-site audit. Due to GFSI v2020.1 Part II 5.34.1, the time period cannot be extended more than ninety (90) days.

11.6 The non-conformances found during the desk review should not be discussed with the organization until the auditor arrives on-site to complete the audit process

11.7 Once the desk review and on-site audit are completed, the auditor must submit the preliminary report in the PrimusGFS system within 15-calendar days of the on-site audit. The preliminary audit report must not be submitted until the desk review and the on-site audit(s) are completed.

11.8 The organization has thirty (30) calendar days from the on-site audit date to review and respond to their non-conformances.

12 Conditions for Suspending or Withdrawing Certification

12.1 PJRFSI is responsible for initiating the suspension and withdrawal of the PrimusGFS Certificate.

12.2 If PJRFSI finds a non-conformance with a certified organization's PrimusGFS Scheme Documentation that is found to be a food safety issue and an immediate threat to the public, a sanction (suspension or revocation) shall be issued.

12.3 All sanctions shall be in writing, and include the nature of the non-conformance, the time frame for resolution (if applicable) and provisions for escalation of sanctions if the non-conformance is not corrected within the specified period.

12.4 Only PJRFSI may lift a suspension sanction after sufficient corrective actions have been submitted, with verification either through written or visual evidence and/or an on-site visit.

12.5 PJRFSI can issue the sanction to an entire certified organization or narrow it to down to a specific operation(s) within the scope of the current certification.

12.6 Suspensions - an organization's certification shall be suspended if:

- a. A non-conformance is found to be a food safety issue and an immediate threat to the public.
- b. If the re-certification audit results in an automatic failure, while the organization still has a valid certificate.

- c. If a critical food safety issue is detected during an audit (e.g., automatic failure, special circumstance, etc.), then PJRFSI should consider suspending existing certificates related to this new observation(s).
- d. An organization does not pay the agreed to fees.
- e. If an organization rejects a surveillance audit on the second CB notification.
- f. The organization improperly uses the PrimusGFS or GFSI logo or trademark.
- g. An organization is involved with an illegal activity or a serious food safety issue.

12.7 Revocations - an organization's certification shall be revoked if:

- a. Evidence of fraud is found
- b. A suspension related issue is not adequately resolved
- c. The organization declares bankruptcy
- d. An organization that has had its certification revoked shall not be accepted for certification in the PrimusGFS program for a period of six months after the date of revocation.

11.8 PJRFSI shall always notify the Scheme Owner in a timely manner and in writing of any sanction applied to a certified organization, as well as update the system to reflect those changes.

11.9 Where the Operation's Certificate is revoked, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate immediately amends the Operation's details on the PrimusGFS Database to a "revoked" status and in writing;

- a. informs the Operation that the PrimusGFS Certificate of Registration has been withdrawn, the reason for such action, the date of effect, and in writing sent by certified mail;
- b. instructs the Operation to return the Certificate;
- c. instructs the Operation to return any electronic copies of the PrimusGFS Logo and comply accordingly with the PrimusGFS Logo Guidelines;

13 Operation Requirement to Notify PJRFSI of Special Situations

13.1 The Operation is required to notify PJRFSI in writing and in a timely manner about any significant change(s), actual or intended, which include but are not limited to:

- a. changes in legal or commercial status including changes in name;
- b. changes in ownership;
- c. changes in key managerial, decision-making or technical staff;
- d. changes in the number of employees;
- e. changes in location and/or number of sites;
- f. damage to the site, e.g., damage by fire or natural disaster such as a flood;
- g. changes to the physical building(s) and/or processing operations and equipment;
- h. changes to the scope of certification (including expansion or reduction) in terms of products, processes, and/or facilities;
- i. changes in the Operation's PrimusGFS System or factors influencing the Operation's PrimusGFS System; and
- j. a food safety incident as described in @10.2.

13.2 If at any time based on available information, the Operation becomes aware that concerns about actual or suspected threats to food safety exist which could require intervention to protect consumers' interests, or upon identification that a food safety event requires public notification (such as a Class I or Class II recall), or other issues that could bring the Scheme into disrepute, Operation must notify PJRFSI and PrimusGFS immediately. The Operation shall notify Perry Johnson Registrars Food Safety, Inc's Food Safety Program Accreditation Manager in writing and by phone call:

- a. **Business hours M-F, 9-5 EST: 248-519-2523**
- b. **After hours and weekends: 248-648-0216**
- c. **Email: foodsafety@pjrfsi.com;**
- d. **PrimusGFS at PrimusGFS@azzule.com**

13.3 Following notification of a food safety event by the Operation, PJRFSI will notify PrimusGFS and any

Accreditation Bodies, as necessary, within (7) seven days of the occurrence and correspond any action PJRFSI intends to take to ensure the integrity of the certification.

13.4 When a certified Operation relocates its business premises, the Operation's Certificate of Registration is no longer valid until a successful Recertification Audit of the new premises as conducted.

13.5 A certified Operation must notify PJRFSI of any change in ownership with thirty (30) days of the effective change. When a certified Operation's ownership changes but key staff responsible for the PrimusGFS System have been retained, PJRFSI confirms the continued effectiveness of the PrimusGFS System within sixty (60) days of the change of ownership by means of a site audit and upon confirmation. This allows the Operation to retain the existing audit frequency status and certification number. If significant changes in key personnel have occurred with the change in ownership, PJRFSI shall complete a full Facility Audit and the Operation's audit frequency status will be based on this new audit activity.

13.6 PJRFSI reserves the right to conduct special audits during the course of the certification period, and as needed in response to changes/incidents as described above. Where such changes may affect the conformity of the product(s) and/or the Operation's PrimusGFS System, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate determines whether the announced changes require further investigation and schedules a special audit as necessary.

13.7 The Operation must not promote products, processes, and/or facilities/sites which have not been covered in the scope of certification as audited and approved by PJRFSI. Unauthorized promotion will result in the withdrawal of the Certificate of Registration.

13.8 Where Operation fails to notify PJRFSI of any of the above changes, PJRFSI may accordingly suspend or withdraw, as deemed appropriate, the Certificate of Registration and reserves the right to retroactively invalidate the Certificate of Registration effective as of the date the change occurred.

14 Promotion of PrimusGFS Certification by Operation

When providing copies of any certification documents (certificates and audit reports) to interested parties, Operations shall reproduce those documents in their entirety or otherwise seek permission in writing from PJRFSI. Operations shall contact the PrimusGFS for authorization to use the PrimusGFS Logo and shall comply with: the latest Terms and Conditions and Logo Guidelines as published by PrimusGFS; and any additional requirements issued by PJRFSI regarding use of certification marks and promotion of certification. The proprietary names and logos of PrimusGFS, any applicable accreditation bodies, and PJRFSI shall not be used by the Operation in any manner which could be misconstrued or defamatory to the respective parties and/or parties' brands. Any misuse of these proprietary names or logos by a certified Operation or an Operation seeking certification shall be reported to the interested parties and responded to with appropriate actions by PJRFSI.

15 Conditions for Change of Certification Body (Transfers)

14.1 A Certified Operation shall ensure it has a certification body appointed at all times. A Certified Operation may elect to cease being a client of a certification body (Former Certifier) and to have PJRFSI, as a New Certifier, undertake audits of its PrimusGFS System.

14.2 In the case that the organization is changing CBs, the applicant is responsible for submitting the request to switch CBs in the PrimusGFS system. Once the transfer is complete, the Corrective Action Report(s) from the prior audit(s) will be provided to the new CB via email from the Scheme Owner. Note: Applicants cannot transfer CBs with audits in progress with their current CB.

14.3 Where a Certified Operation elects to transfer its Certificate of Registration to PJRFSI, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate undertakes a pre-transfer review of the Operation's Certification and completes the F-144fsi Transfer of Certification Body Checklist to:

- confirm the Certificate is current, valid, and relates to the PrimusGFS System so Certified;

- b. confirm Certification under Former Certifier is not suspended or under threat of suspension or withdrawal.
- c. confirm that the Operation has closed all non-conformities issued by the Former Certifier;
- d. review the Operation's Audit history (where the Operation can demonstrate such history to the satisfaction of PJRFSI by way of copies of Audit reports completed by any Former Certifier) and the impact of any outstanding Nonconformities.
- e. If it becomes known that an applicant is switching from another GFSI recognized certification program, the CB shall request the organization's audit history including both announced and unannounced audits and any additional information necessary to evaluate this applicant.

14.4 Where a decision is made to proceed with Certification, PJRFSI:

- 14.4.1 Food Safety Program Accreditation Manager or designee signs off on the completed F-144fsi.
- 14.4.2 PJRFSI conducts the required audit which was described by the Former Certification Body within timelines consistent with the PrimusGFS program audit frequency and certification requirements; and
- 14.4.3 issues a new Certificate of Registration under PJRFSI.

15 **Disputes and Appeals**

Disputes and appeals are handled in accordance with PJRFSI's Dispute/Appeal Procedure (#SOP-10), which is available upon request.

16 **Confidentiality**

PJRFSI, including all auditors, administrative staff, Technical Reviewer, Impartiality Committee, and any other employee or contractor, ensures that all records, data, and information received during the execution of any audit activity remain confidential and the property of the Operation. Only with the Operation's authorization will PJRFSI release audit data to any entity other than PrimusGFS except when mandated by law, statute, or the regulations of accreditation bodies. In the event that disclosure of such information is required by law or statute or accreditation body regulations, PJRFSI will disclose the information as required and inform the Operation of such disclosure in writing in a timely fashion.